

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# **Exhibit 57**

1  
2 IN THE UNITED STATES DISTRICT COURT.  
3 FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

4 -----x  
THE SOUTH CAROLINA STATE CONFERENCE  
5 OF THE NAACP

6 and

7 TAIWAN SCOTT, ON BEHALF OF HIMSELF Case No.  
8 AND ALL OTHER SIMILARLY SITUATED 3:21-CV-03302  
PERSONS, JMC-TJH-RMG

9 Plaintiffs,

10 Vs.

11 THOMAS C. ALEXANDER, IN HIS OFFICIAL  
CAPACITY AS PRESIDENT OF THE SENATE;  
12 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY  
AS CHAIRMAN OF THE SENATE JUDICIARY  
COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL  
13 CAPACITY AS SPEAKER OF THE HOUSE OF  
REPRESENTATIVES; CHRIS MURPHY, IN HIS  
14 OFFICIAL CAPACITY AS CHAIRMAN OF THE  
HOUSE OF REPRESENTATIVES JUDICIARY  
COMMITTEE; WALLACE H. JORDAN, IN HIS  
15 OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE  
OF REPRESENTATIVES ELECTIONS LAW  
16 SUBCOMMITTEE; HOWARD KNAPP, IN HIS  
OFFICIAL CAPACITY AS INTERIM EXECUTIVE  
17 DIRECTOR OF THE SOUTH CAROLINA STATE  
ELECTION COMMISSION; JOHN WELLS, JOANNE  
18 DAY, CLIFFORD J. EDLER, LINDA MCCALL,  
19 AND SCOTT MOSELEY, IN THEIR OFFICIAL  
CAPACITIES AS MEMBERS OF THE SOUTH  
20 CAROLINA STATE ELECTION COMMISSION,  
21 Defendants.

22 -----x  
STENOGRAPHIC REMOTE VIRTUAL DEPOSITION  
23 BREEDEN JOHN  
24 Tuesday, August 9, 2022  
25

1 JOHN

2 office had created?

3 A. No. I wasn't sure who  
4 created it. Like I said, I got  
5 there a little bit late so I didn't  
6 know if they had talked about that  
7 before I got there or not, but I  
8 didn't ask who created it.

9 Q. Did you understand any of  
10 the -- Mr. Tresvant? Is that right?

11 A. Yes, Tresvant.

12 Q. Did you understand any of  
13 the suggestions to be requests on  
14 behalf of Congressman Clyburn or  
15 more informal discussions about the  
16 district?

17 A. It was more informal  
18 discussions less so not requests  
19 just kind of maybe a statement of  
20 preferences, you know, it would be  
21 nice if X area was included but it  
22 wasn't a specific request.

23 Q. Were you involved at all in  
24 any follow-up with anyone else from  
25 Representative Clyburn's office

1 JOHN

2 after this meeting?

3 A. No.

4 Q. Did you have any other  
5 conversations or become aware of  
6 conversations about any other  
7 suggestions or thoughts from  
8 Representative Clyburn's office?

9 A. No, not that I recall.

10 Q. Were you involved in any  
11 discussions with anyone from  
12 Congressman Wilson's office?

13 A. I was in the room while  
14 Charlie Terreni spoke with, I think  
15 it was directly with Congressman  
16 Wilson or it could have been a  
17 staffer. So I guess I overheard a  
18 conversation but I wasn't really  
19 involved.

20 Q. Was that in -- I assume it  
21 was -- was that in Senator Rankin's  
22 office too?

23 A. Yes, it was.

24 Q. Do you recall how long that  
25 meeting was?

1 JOHN

2 A. That phone conversation was  
3 fairly short. Five minutes at the  
4 most I would think.

5 Q. You mentioned you weren't  
6 part of the conversation. Did you  
7 and Mr. Terreni have any  
8 conversation after it with any  
9 feedback or debrief?

10 A. We just kind of talked  
11 about what they discussed on the  
12 phone and it was -- again it was  
13 Mr. Terreni, Fiffick, Will Roberts,  
14 myself. We were working -- we were  
15 just working on maps and I don't  
16 remember what spurred the  
17 conversation but he called the  
18 Congressman. He called whoever it  
19 was he spoke with, whether it was  
20 the Congressman or a staffer I don't  
21 recall exactly but they just talked  
22 about -- about the districts. I  
23 don't recall -- I don't think that  
24 -- I know it was prior to the Senate  
25 releasing their staff congressional

1 JOHN

2 plan and I don't think that the  
3 House had put anything out yet. So  
4 I don't exactly remember what the  
5 impetus was for the conversation.

6 Q. Do you recall any feedback  
7 from either Congressman Wilson or  
8 his office on how CD 2 should be  
9 drawn?

10 A. Yes. I remember their  
11 express interest in Fort Jackson  
12 being included in the 2nd. That was  
13 really the only specific area I  
14 recall.

15 Q. Were you involved in any  
16 follow-up after that initial  
17 meeting?

18 A. No.

19 Q. Did you at all become aware  
20 of any additional feedback from  
21 Congressman Wilson's office on any  
22 proposed maps by the Senate  
23 subcommittee?

24 A. No, not that I recall.

25 Q. Were you at all involved in

1 JOHN

2 any discussions with Congresswoman  
3 Mace's office about CD 1?

4 A. No.

5 Q. Do you recall receiving any  
6 feedback from other members of the  
7 Senate staff regarding input from  
8 Congresswoman Mace's office?

9 A. No, I don't.

10 Q. What about any feedback or  
11 conversations with Congressman  
12 Rice's office?

13 A. No.

14 Q. Outside of these members  
15 any other members of Congress or  
16 former members of Congress that you  
17 recall speaking to during the  
18 congressional redistricting process?

19 A. None that I spoke to.

20 Q. Who else were you aware of  
21 that was -- had conversations?

22 A. Andy Fiffick spoke with  
23 Congressman Timmons at one point.

24 Q. Anyone else?

25 A. That's all I remember.

1 JOHN

2 Q. Did you receive any  
3 instructions for how you should  
4 assess or evaluate any of the  
5 feedback you received from members  
6 of Congress in drawing maps?

7 A. Not particularly.

8 Q. Would you consider  
9 suggestions they had of equal weight  
10 to members of the public?

11 A. Yes, for the most part.  
12 The feedback that we got from them I  
13 would say yes for the most part.

14 Q. Were there any political  
15 organizations that you had  
16 conversations with?

17 A. No.

18 Q. Anyone obvious working on  
19 behalf of any organizations?

20 A. No.

21 Q. Any consultants?

22 A. No.

23 Q. Lobbyists?

24 A. I did speak with Dr. John  
25 Ruoff, R-U-O-F-F. He was working



1 JOHN

2 A. Yes.

3 Q. Did you prepare any  
4 materials for this one?

5 A. Same notebooks -- I mean  
6 same map and reports that were  
7 always going in the notebooks. I  
8 may have talked with Will about his  
9 overview that the notes that he was  
10 putting together to give his  
11 overview and looked at that, you  
12 know, with him a little bit in our  
13 shared office here but I didn't  
14 really prepare anything for my own  
15 use.

16 Q. And so do you recall any  
17 common themes that were raised or  
18 that you identified that were worth  
19 following up with after the hearing?

20 A. As far as the testimony  
21 that we received on it? Yeah, I  
22 was, honestly I was a little  
23 disappointed that it got such a  
24 harsh reception. I kind of felt  
25 like it was a pretty good plan and

1 JOHN

2 you know, it was met with a lot of  
3 strong criticism from different  
4 groups. And, you know what, it's  
5 certainly understandable. But it  
6 was -- the reception was not what I  
7 was expecting, you know.

8 Q. And what did you understand  
9 some of the criticisms to be  
10 specifically?

11 A. It was stated that it was,  
12 you know, heavily racially  
13 motivated. Could only be explained  
14 by race. It was drawn by partisan  
15 hacks in Washington, D.C. and, you  
16 know, just how unfair it was and I  
17 was surprised to hear some of that.

18 Q. Was some of the reference  
19 you mentioned about, I'll use your  
20 term, partisan hacks, was that  
21 between former Congressman  
22 Cunningham and Senator Harpootlian?

23 A. Yes, it was.

24 Q. Do you recall members of  
25 the public at all testifying and